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BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

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December 15, 2004

T.R.A. DOCKET ROOM

IN RE: BellSouth's Motion For The
Establishment of a New Performance Plan

)
) Docket No. 04-00150
)
)

COMPSOUTH'S DATA REQUESTS TO
BELL SOUTH TELECOMMUNICATIONS, INC.

Competitive Carriers of the South ("CompSouth"), hereby serves the following Data Request to BellSouth Telecommunications, Inc. ("BellSouth").

DEFINITIONS

1. "BellSouth" means BellSouth Telecommunications, Inc., and its parents, subsidiaries, and affiliates, their present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of BellSouth Telecommunications, Inc.

2. The terms "you" and "your" refer to BellSouth.

3. "CompSouth" means Competitive Carriers of the South its subsidiaries and affiliates, their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of CompSouth.

4. The term "person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

5. The term "document" shall have the broadest possible meaning under applicable law. "Document" means every writing or record of every type and description that is in the possession, custody or control of BellSouth, including, but not limited to, correspondence,

memoranda, drafts, workpapers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail files; and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" further includes, by way of illustration and not limitation, schedules, progress schedules, time logs, drawings, computer disks, charts, projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

6. The term "referring or relating to" means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

7. "And" and "or" as used herein shall be construed both conjunctively and disjunctively and each shall include the other whenever such construction will serve to bring within the scope of these discovery requests any information that would otherwise not be brought within their scope.

8. "Affiliate" or "affiliated" means an entity that directly, or indirectly through one or more intermediaries, controls, or is controlled by, or is under common control with, another entity.

9. "Identify" or "identifying" or "identification" when used in reference to a document means to provide with respect to each document requested to be identified by these discovery

requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duces tecum, including the following:

- a) the type of document (e.g., letter, memorandum, etc.);
- b) the date of the document;
- c) the title or label of the document;
- d) the Bates number or other identifier used to number the document for use in litigation;
- e) the identity of the originator;
- f) the identity of each person to whom it was sent;
- g) the identity of each person to whom a copy or copies were sent;
- h) a summary of the contents of the document;
- i) the name and last known address of each person who presently has possession, custody or control of the document; and
- j) if any such document was, but is no longer, in your possession, custody or control or is no longer in existence, state whether it: (1) is missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and, if so, state the circumstances surrounding the authorization for each such disposition and the date of such disposition.

GENERAL INSTRUCTIONS

1. If you contend that any response to any data request may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:

- a) the privilege asserted and its basis;
- b) the nature of the information withheld;
- c) the subject matter of the document, except to the extent that you claim it is privileged.

2. These discovery requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These discovery requests are intended to include requests for information, which is physically within your possession, custody or control as well as in the possession, custody or control of your agents, attorneys, or other third parties from which such documents may be obtained.

3. If any data request cannot be answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.

4. For each data request, provide the name of the company witness(es) or employee(s) responsible for compiling and providing the information contained in each answer.

DATA REQUESTS

1. Please provide the amount of Tier II remedies that were paid each month for each state in the BellSouth region for the years 2003 and 2004.

RESPONSE

2. Please provide a detailed comparison of the Aggregate SEEM results and penalties produced by a measure-based and a transaction-based penalty plan using Tennessee data from January through October 2004. Please use the Georgia SEEM plan to approximate the SEEM results for the transaction-based plan. Specifically, for each month and for each

submetric, provide the amount that was paid to CLECs and the Commission under the current measure-based plan in Tennessee, as well as the penalties BellSouth would have paid if the transaction-based Georgia SEEM plan had been in place in Tennessee during that same period. Please provide these results for Tier I and Tier II submetrics in both pdf and Excel file formats.

RESPONSE

3. For the most recent six (6) months for which Tennessee data are available, please provide a spreadsheet which displays, by submetric, the volume of transactions for each submetric for each of the six (6) months. Use the same format that BellSouth used to provide the data described in BellSouth's Response to Action Item 4 filed in Florida on October 20, 2004. Please provide the results in both pdf and Excel file formats.

RESPONSE

4. Has BellSouth performed data modeling scenarios of any kind or other types of test runs or data analysis of the performance plans it has proposed, considered proposing or that it plans to propose for adoption in Tennessee?

RESPONSE

(a) If no, then please explain, with specificity, the reasoning behind why BellSouth chose not to do so?

RESPONSE

(b) If yes, then please identify in detail the data used (i.e., what period and what portion of data was used and was that data manipulated in any fashion before it was used in such modeling and/or analysis).

RESPONSE

(c) Furthermore, please identify and describe each of the software applications / programs that were used to conduct the modeling and/or analysis of the data.

RESPONSE

(d) Please provide copies of all documentation, analysis, and work papers, etc. of any form, describing the modeling and testing of all versions of plans it has proposed, considered proposing or that are planned for proposal by BellSouth in Tennessee. In addition, please provide copies of any and all modeling and/or test results in their native application format as well as in both PDF and Excel file formats.

RESPONSE

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: 

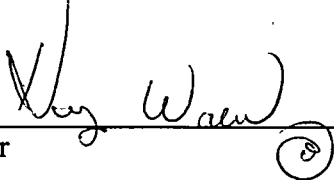
Henry M. Walker (No. 000272)
1600 Division Street, Suite 700
P.O. Box 340025
Nashville, Tennessee 37203
(615) 252-2363

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded electronically and via U.S. Mail, postage prepaid, to:

Guy M. Hicks
BellSouth Telecommunications, Inc.
333 Commerce Street
Suite 2101
Nashville, TN 37201-3300

on this the 15th day of December, 2004.



Henry Walker